

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 Nevada Bar No. 13644
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
Nevada Bar No. 1925
4 501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
5 Telephone: 702-388-6336
Daniel.hollingsworth@usdoj.gov
6 Attorneys for the United States of America

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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA ,
12 Plaintiff,
13 v.
14 CLAUDIA ANN MERRILL,
15 Defendant.

2:20-CR-001-JCM-BNW

Government's Unopposed Motion To Extend the Time to File its Responses Regarding Forfeiture and Restitution regarding Merrill's sentencing memorandum, ECF No. 37, and Order (First Request)

16 The United States of America respectfully moves this Court for an Order extending
17 the time to file the government's response regarding forfeiture until December 2, 2020, and
18 the government's response regarding restitution until December 3, 2020, to Claudia Ann
19 Merrill's (Merrill) sentencing memorandum. Both are due December 1, 2020. This is the
20 first request.

21 The grounds for extending the time are as follows.

22 On Sunday November 29, 2020, at 9:30 pm, Merrill filed a sentencing
23 memorandum, challenging the criminal forfeiture money judgment of \$1,775,412.79 and
24 restitution relating to offsets or credits.¹

25 The undersigned has a large and active case load. He was informed on November
26 30, 2020, at night that his use or love annual leave was cancelled so that he could address
27 the restitution and forfeiture credit or offset issue and argue the issues at Merrill's sentencing

28 ¹ Merrill's Sentencing Memorandum (MSM), ECF No. 37.

1 on Friday, December 4, 2020. Undersigned began drafting the forfeiture response on
2 December 1, 2020, and has not completed it. Undersigned has worked extremely hard and
3 efficiently to meet both deadlines, but he has not had time to complete the forfeiture
4 response and has not started the restitution response.

5 On December 1, 2020, the undersigned counsel called Sanford A. Schulman,
6 counsel for defendant, who agreed to these extensions of time.

7 This Motion is not submitted solely for the purpose of delay or for any other
8 improper purpose.

9 This Court should grant an extension of time to, and including, December 2, 2020,
10 for the United States to file its forfeiture and an extension of time to, and including
11 December 3, 2020, to file its restitution response.

12 DATED: December 1, 2020.

13 NICHOLAS A. TRUTANICH
14 United States Attorney

15 /s/ Daniel D. Hollingsworth
16 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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19 IT IS SO ORDERED:
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22 JAMES C. MAHAN
23 UNITED STATES DISTRICT JUDGE

24 DATED: December 2, 2020
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